

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

GARNELL BAILEY	:	No. 02-CV-4683
3563 Driftwood Place	:	
Bethlehem, PA 18020	:	
	:	
v.	:	
	:	
LUCENT TECHNOLOGIES INC.	:	
555 Union Boulevard	:	
Allentown, P A 18109-3286	:	
	:	
AND	:	
	:	
AGERE SYSTEMS INC.	:	
555 Union Boulevard	:	
Allentown, PA 18109-3286	:	

MOTION FOR ENLARGEMENT
OF TIME TO SUBMIT EXPERT REPORTS

Plaintiff Garnell Bailey, by and through her attorney, GLENNIS L. CLARK, ESQUIRE, hereby respectfully moves this Honorable court for an extension of time within which to submit expert reports. In support of this Motion, Plaintiff represents the following:

1. Pursuant to the Court's Order dated November 20 , 2002, plaintiff's expert report(s) was to be exchanged no later than February 18, 2003. A copy of which is incorporated herein, made a part hereof and marked as Exhibit "A."

2. Plaintiff has requested reports from three (3) potential experts but has not received the same.

3. Counsel has been unable to obtain the specific dates on which the expert reports will be available.

4. Counsel was unable to reach opposing counsel regarding their position.

5. Plaintiff respectfully requests an additional thirty (30) days, on or before March 18, 2003.

Respectfully submitted:

GLENNIS L. CLARK
I. D. No. 36682
Attorney for Plaintiff
LAW OFFICE OF GLENNIS L. CLARK
532 Walnut Street
Allentown, PA 18101
610-433-6624

Dated: _____

CERTIFICATE OF SERVICE

I, Glennis L. Clark, Esquire, hereby certify that I have caused to be served a true and correct copy of the motion for enlargement of time to submit expert reports via first class mail, postage prepaid on the date stated below to the offices of:

Barbara Rittinger Rigo, Esquire
Littler Mendelson
Three Parkway
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102

Robert W. Cameron, Esquire
Littler Mendelson
Dominon Tower
625 Liberty Avenue, 26th Floor
Pittsburgh, PA 15222-3110

Dated: _____

GLENNIS L. CLARK
I. D. No. 36682
Attorney for Plaintiff